

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Stacey Lynne Griffin	:	Chapter 13
	:	Case No.: 21-12777-AMC
Debtor(s)	:	

OBJECTION TO PROOF OF CLAIM #2-2
OF BANK OZK

Debtor, Stacey Lynne Griffin, by attorney Brad J. Sadek, hereby to the Proof of Claim No. 2-2 filed on behalf of Bank OZK and in support thereof avers the following:

1. Debtor filed a Chapter 13 Bankruptcy Petition on October 8, 2021.
2. Creditor, Bank OZK filed an Amended Proof of Claim (#2-2) on October 6, 2022 in the amount of \$12,734.65. See Exhibit "A."
3. The debtor surrendered the vehicle for which the claim was filed in November 2021 via an Order entered granting relief to Bank OZK.
4. The last date to file a proof of claim was December 17, 2021.
5. In re Metro Transportation Co., 117 B.R. 143, 147 (Bankr E.D. Pa. 1990), amendments to timely proofs of claims are liberally allowed and may relate back to the initial filing if filed after the bar date, but will not be permitted if they constitute new claims.
6. The amended claim in this case "asserts entirely new matter" as it is for "a deficiency resulting from disposition of collateral." In re Hibble, 371 B.R. 730 at 737-38 (Bankr. E.D. Pa. 2007).

WHEREFORE, Debtor, Stacey Lynne Griffin, by and through the undersigned counsel, respectfully requests this Honorable Court to enter an Order disallowing Proof of Claim #2-2 of Bank OZK in its entirety.

Dated: November 3, 2022

/s/ Brad J. Sadek, Esq.
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